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|--|--|--------------------|---|--|--|
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| 12 13 | *Admitted pro hac vice UNITED STATES DISTRICT COURT | | | | |
| 141516 | DISTRICT OF NEVA REPUBLICAN NATIONAL COMMITTEE, NEVADA REPUBLICAN PARTY, and SCOTT JOHNSTON, | | :24-CV-00518 | | |
| 17 18 19 20 21 22 23 | Plaintiffs, v. FRANCISCO AGUILAR, in his official capacity as Nevada Secretary of State; LORENA PORTILLO, in her official capacity as the Registrar of Voters for Clark County; WILLIAM "SCOTT" HOEN, AMY BURGANS, STACI LINDBERG, and JIM HINDLE, in their official capacities as County Clerks, Defendants. | TO C HEA WEE | PPOSED MOTION CONTINUE RING FOR ONE K T REQUEST | | |
| 2425 | | | | | |

This is the first motion to continue the hearing on Defendants' motion to dismiss scheduled for June 7, 2024. Plaintiffs—the Republican National Committee, Nevada Republican Party, and Scott Johnston—request a one-week continuance, and the motion is unopposed. In support of the motion, Plaintiffs state the following:

- 1. On April 15, 2024, Defendant Francisco Aguilar filed his motion to dismiss, Doc. 26. The other defendants joined the motion. *See* Docs. 27, 28, 30, 31, 38.
- 2. On May 24, 2024, the Court ordered a hearing on the motion to dismiss, Doc. 67. The hearing is scheduled for Friday, June 7, 2024.
 - 3. Plaintiffs' counsel has a number of commitments next week, including:
 - a. A response to a preliminary injunction motion in the District of New Jersey due on June 3.
 - b. A Sixth Circuit brief due on June 4.
 - c. A response to a preliminary injunction motion in the Northern District of Alabama due on June 7.
 - d. A response to a preliminary injunction motion in Wisconsin state court due on June 7.
 - e. A response to a preliminary injunction motion in the Northern District of Georgia due on June 7.
 - f. Objections to the report and recommendation granting intervention in this case (Doc. 68) due on June 7.
- 4. Noting this Court's practice to encourage litigants to permit more junior attorneys to handle argument, *see* Chambers Practices of United States District Judge Cristina D. Silva, Rule III.a, Plaintiffs intend to designate Conor Woodfin, an attorney with fewer than six years' experience, to argue the motion.

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| 1 | 5. Therefore, Plaintiffs res _l | pectfully request that the Court continue the | | |
| 2 | hearing scheduled on the motion to dismiss by one week, and set the hearing for June | | | |
| 3 | 14, 2024, if convenient for the Court. If the Court is unavailable that day, the parties are | | | |
| 4 | willing to meet and confer about an alternative date. | | | |
| 5 | 6. Plaintiffs submit this stipulation in good faith and without any intent to | | | |
| 6 | cause undue delay in this case. | | | |
| 7 | 7. Defendants do not oppose this motion. | | | |
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| 9 | Dated: June 3, 2024 | Respectfully submitted, | | |
| 10 | | <u>/s/ Jeffrey F. Barr</u> | | |
| 11 | Thomas R. McCarthy* | Jeffrey F. Barr (Bar No. 7269) | | |
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| 18 | Counsel for Plaintiffs | | | |
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| | Motion to Continue Hearing | | | |

CERTIFICATE OF SERVICE I certify that on June 3, 2024, this motion was served via the United States District Court's CM/ECF system on all parties or persons requiring notice. By: <u>/s/ Jeffrey F. Barr</u> Motion to Continue Hearing